

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ORDER SHORTENING THE NOTICE AND OBJECTION PERIODS
WITH RESPECT TO THE EMERGENCY MOTION OF THE JOINT
PROVISIONAL LIQUIDATORS OF FTX DIGITAL MARKETS LTD. (I) FOR
RELIEF FROM AUTOMATIC STAY AND (II) TO COMPEL TURNOVER OF
ELECTRONIC RECORDS UNDER SECTIONS 542, 1519(A)(3), 1521(A)(7)
AND 1522 OF THE BANKRUPTCY CODE**

Upon the motion (the “**Motion to Shorten**”)² of Brian C. Simms KC, Kevin G. Cambridge, and Peter Greaves, in their capacity as the duly appointed joint provisional liquidators of FTX Digital Markets Ltd. (the “**Joint Provisional Liquidators**”), for entry of an order (this “**Order**”) shortening the notice and objection periods with respect to the Emergency Motion, all as more fully set forth in the Motion to Shorten; and the Court having reviewed the Motion to Shorten and all pleadings related thereto; and the Court having held a hearing, if any, to consider the relief requested therein; and the Court having considered the arguments of counsel made, and the evidence adduced at the hearing on the Motion to Shorten, if any; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors (the “**U.S. Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the U.S. Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Motion to Shorten.

District of Delaware dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion to Shorten having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation thereon and sufficient cause appearing therefor:

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion to Shorten is GRANTED as set forth herein.
2. The hearing to consider the relief requested by the Emergency Motion will be held on **December ____, 2022 at ____:____ (Eastern Time)**.
3. Objections to the relief requested by the Emergency Motion, if any, must be filed on or before **December ____, 2022 at 12:00 p.m. (Eastern Time)**.
4. The Joint Provisional Liquidators are hereby authorized and empowered to take all actions as may be necessary to implement and effect the terms and requirements established in this Order.
5. The Court has and will retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.